

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

May 8, 2025
Case: 1:25-cv-00806(VSB)(GS)

-----X
BRIAN NG

Plaintiffs,

-against-

LETTER MOTION
AND OBJECTION
To AmGUARD Untimely/Late
Answer Filed on 04/24/2025

AmGUARD INSURANCE COMPANY;
NORTH AMERICAN RISK SERVICES, INC;
EBERL CLAIMS SERVICES LLC.

Defendants.
-----X

MEMO ENDORSED

RECEIVED
SDNY PRO SE OFFICE
2025 MAY -8 PM 4:11

To: Honorable Vernon S. Broderick, or To: Honorable Gary Stein,

I am Brian Ng, (Plaintiff, Pro Se) in this case, currently pending before this Court. I respectfully moves the Court and raise an objection to the answer by defendant AmGUARD Insurance Company filed in this Court on April 24, 2025.

On April 11, 2025, I filed a Waiver of Service of Summons with regard to Defendant, AmGUARD Insurance Company (Docket #23) The docket entry reflects that it was entered on April 14, 2025. Additionally, the docket entry further notes "Answer due on April 15, 2025."

There is nothing filed on the docket or shown anywhere that defendant AmGUARD Insurance Company filed any request or made a motion for extension of time to answer the amended complaint on April 24, 2025, and no reasonable explanation given, and AmGUARD had never contacted me and request an extension of time.

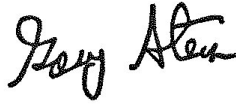
Therefore, I respectfully raised this objection and requesting that this Honorable Court deem that the answer filed by AmGUARD Insurance Company untimely/late and null and void.

Respectfully Submitted,
Brian Ng
Church Street Station
P.O. Box 2723
New York, NY 10008
Tel: 646.820.9238

Application denied. Defendant AmGUARD Insurance Company ("AmGUARD") timely answered the Amended Complaint. Under Federal Rule of Procedure 15, a party is required to answer an amended complaint "within the time remaining to respond to the original pleading or within 14 days after service of the amended pleading, whichever is later." Fed. R. Civ. P. 15(a)(3). Here, Plaintiff served and filed his Amended Complaint on April 11, 2025 (Dkt. No. 20), and AmGUARD filed its answer on April 24, 2025 (Dkt. No. 25), within the 14 days permitted under Rule 15(a)(3). Thus, AmGUARD's response was timely.

Date: May 9, 2025
New York, NY

SO ORDERED:

A handwritten signature in black ink, appearing to read "Gary Stein", is written above a horizontal line.

HON. GARY STEIN
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
BRIAN NG

Plaintiffs,

Civil Case Action 1:25-cv-00806

-against-

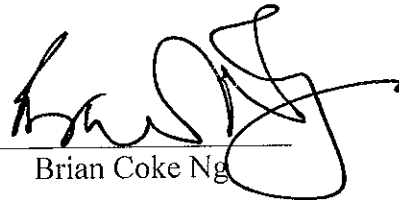
AmGUARD INSURANCE COMPANY;
NORTH AMERICAN RISK SERVICES, INC;
EBERL CLAIMS SERVICES LLC.

Defendants.
-----X

CERTIFICATE OF SERVICE

I, Brian Ng, (Plaintiff, Pro Se) hereby certify and declare under penalty of perjury that on May 8, 2025, my Letter motion and Objection to AmGUARD Untimely/Late Answer Filed on 04/24/2025, have been submitted for filing by the pro se office electronically using the Court's Electronic Case Filing ("ECF") System, which sent a notice of filing activity to all attorney(s) of record. These documents are available for viewing and downloading from the Court's ECF System.

Dated: May 8, 2025
New York, N.Y.



Brian Coke Ng

Church Street Station
P.O. Box 2723
New York, N.Y. 10008
Tel/Fax: 646-820-9238

CIVIL CASE#: 1:25-cv-00806

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

U.S. COURTHOUSE, 500 PEARL STREET, NEW YORK, N.Y. 10007

BRIAN NG

Plaintiff,

-against-

**AmGUARD INSURANCE COMPANY;
NORTH AMERICAN RISK SERVICES, INC;
EBERL CLAIMS SERVICES LLC.**

Defendants

PLAINTIFF'S LETTER MOTION

AND OBJECTION To AmGUARD Untimely/Late Answer Filed on 04/24/2025

**To the best of my knowledge, information and belief,
formed after an inquiry reasonable under the circumstances,
The presentation of these papers or the contentions therein
are not frivolous as defined in subsection (c) of section
130-1.1 of the Rules of the Chief Administrator (22NYCRR)**

SELF REPRESENTED LITIGANT INFORMATION

May 8, 2025

Sign Name:

Print Name: BRIAN NG

Address:

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P.O. Box 2723

New York, N.Y. 10008

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